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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GABRIELLA SANTIBANEZ AND
LISA HAZARD,

Defendant.

CASE NO. 2:22-cr-00235 WBS

STIPULATION AND ~~PROPOSED~~
PROTECTIVE ORDER RE:
DISSEMINATION OF DISCOVERY
DOCUMENTS CONTAINING
PERSONAL IDENTIFYING
INFORMATION AND MEDICAL
RECORDS

IT IS HEREBY STIPULATED AND AGREED among the parties that the documents provided as discovery in this case to defense counsel for Gabriella Santibanez and Lisa Hazard are subject to a Protective Order.

The parties agree that discovery in this case contains “Protected Information,” which is defined here as including patient and employee names, names of minors, medical records, diagnoses, social security numbers, Medicare numbers, tax records, driver’s license numbers, bank account numbers, financial account numbers, dates of birth, addresses, telephone numbers, and email addresses. The Protective Order signed in this case extends to all documents and other material provided.

By signing this Stipulation, defense counsel agrees that the Protected Information is being entrusted to counsel only for the purposes of representing Gabriella Santibanez and Lisa Hazard in this case. Further, defense counsel agrees not to share any documents that contain Protected Information with anyone other than his designated defense investigators, experts, and support

1 staff. Defense counsel may permit Gabriella Santibanez and Lisa Hazard to review the Protected
2 Information and be aware of its contents, but Gabriella Santibanez and Lisa Hazard shall not be
3 given control of the Protected Information or be provided any copies of the discovery. Any
4 person receiving Protected Information or a copy of the Protected Information from counsel for
5 Gabriella Santibanez and Lisa Hazard shall be bound by the same obligations as counsel and
6 further may not give the Protected Information to anyone (except that the protected documents
7 shall be returned to counsel).

8 Notwithstanding the foregoing, counsel for Gabriella Santibanez and Lisa Hazard will
9 return all discovery to the United States or destroy it within five years of signing this Protective
10 Order. If counsel needs to retain the discovery produced for a longer period of time, she will
11 seek permission from the United States Attorney's Office. Gabriella Santibanez and Lisa Hazard
12 will not retain any copies in any format of the discovery.

13 Any attorney work product produced will not be deemed a waiver of work product doctrine
14 protection.

15 In the event that Gabriella Santibanez and Lisa Hazard substitutes counsel, undersigned
16 defense counsel agrees to withhold these documents from new counsel unless and until
17 substituted counsel agrees also to be bound by this order.

18 DATE: August 9, 2023

/s/ SUMMER MCKEIVIER

Attorney for Gabriella Santibanez and Lisa Hazard

20 DATE: August 9, 2023

PHILLIP A. TALBERT

United States Attorney

22 By: /s/LEE S. BICKLEY

LEE S. BICKLEY

Assistant U.S. Attorney

25 **IT IS SO ORDERED:**

26 DATED: August 10, 2023_



THE HONORABLE JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE